

1 THE HONORABLE RICHARD A. JONES
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8 UNITED STATES DISTRICT COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 COZEN O'CONNOR,

12 Plaintiff,

13 v.

14 STB, INC. d/b/a STB LIFESAVING
15 TECHNOLOGIES, INC.,

16 Defendant.

17 **CASE NO.: 2:17-CV-00139-RAJ**

18 **DECLARATION OF
19 WILLIAM H. WALSH IN SUPPORT
20 OF PLAINTIFF'S MOTION FOR
DEFULT**

21 **NOTE ON MOTION CALENDAR:
22 NOVEMBER 2, 2022**

23 I, William H. Walsh, hereby declare as follows:

24 1. I am attorney of record for the Plaintiff, Cozen O'Connor in the above-entitled
25 action, and I am familiar with the file, records and pleadings in this matter. I make this
declaration based upon my personal knowledge in support of Plaintiff's Motion for Entry of
Default Judgment.

26 2. Defendants Defendant STB, Inc. d/b/a STB Lifesaving Technologies, Inc., was
served with the Summons and Complaint in the above-captioned matter, with the first date of
service occurring on February 24, 2017.

3. On June, 13, 2017, Plaintiff filed a status report with the Court notifying it that
STB had entered into a receivership proceeding filed in King County Superior Court under

27 DECLARATION OF WILLIAM H. WALSH IN SUPPORT OF
28 PLAINTIFF'S MOTION FOR DEFULT - 1

29 Case No.: 17-cv-00139-RAJ

30 **LAW OFFICES OF
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A PROFESSIONAL CORPORATION
SUITE 1900
999 THIRD AVENUE
SEATTLE, WASHINGTON 98104
(206) 340-1000**

Cause No. 17-2-06030-5, and this matter was subsequently stated pending the outcome of the receivership action. On June 9, 2022, the state Court approved the receivership's final accounting and entered an Order terminating the case.

4. On August 22, 2022, Plaintiff notified this Court of the same and on September 9, 2022, this Court entered an Order lifting the stay. During this time, the Court contacted the parties of record and asked Mr. Jackson if he intended on filing a notice of appearance on behalf of the Defendant, however no response was received and the Defendant has failed to respond to the allegations contained in Plaintiff's Complaint.

5. Defendant has failed to plead or otherwise defend with regard to the plaintiff's judgment for affirmative relief as sought in this matter's Complaint.

DATED: October 14, 2022.

/s/ William H. Walsh
William H. Walsh

DECLARATION OF WILLIAM H. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT - 2

Case No.: 17-cv-00139-RAJ

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CERTIFICATE OF SERVICE

The undersigned hereby certifies, under penalty of perjury under the laws of the State of Washington, that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the registered ECF recipients at their registered emails as follows:

VIA ECF EMAIL NOTIFICATION

Dillon E. Jackson, WSBA No. 1539
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Attorneys for Receiver of STB

DATED this 14th day of October, 2022.

COZEN O'CONNOR

By: /s/ Erin N. Gilbert
Erin N. Gilbert, Legal Assistant
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Telephone: 206.340.1000
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DECLARATION OF WILLIAM H. WALSH IN SUPPORT OF
PLAINTIFF'S MOTION FOR DEFAULT - 3

Case No.: 17-cv-00139-RAJ

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